EXHIBIT 2

2010

YAR No. 328248

IN THE SUPREME COURT OF NOVA SCOTIA

BETWEEN:

Trout Point Lodge, Limited, a Nova Scotia Limited Company

Plaintiff

- and -

Louisiana Media Company, LLC, a Delaware Limited Liability Company

Defendant

Affidavit of Charles Leary

Affidavit of Charles Leary relating to motion under Rule

I make oath and give evidence as follows:

1. I am Charles Leary of Kemptville, Nova Scotia. I am also a Managing Director of Trout Point Lodge, Limited.

2. I have personal knowledge of the evidence sworn to in this affidavit except where otherwise stated to be based on information and belief.

3. I state, in this affidavit, the source of any information that is not based on my own personal knowledge, and I state my belief of the source.

4. Attached hereto as Exhibit "A" are comments and publications from the blog slabbed wordpress.com appearing on the Internet. These publications were first made between February, 2010 and March, 2011.

5. During April and May, 2011, I monitored and read numerous posts and comments on slabbed.wordpress.com that referred to me and my business associates Daniel Abel and Vaughn Perret as "the girls." I verily believe these publications. I believe the use of this phrase is meant to be derogatory and anti-gay.

6. On May 4, 2011 a person using the psuedonym Sop81_1 published that a post entitled "I'm diggin' up bones, exhuming things that everyone needs to know....." The post began: "Yes I can verify the girls are quite the litigious bunch!" This post refers to Daniel Abel, Vaughn Perret, and myself. Vaughn Perret and Daniel Abel are attorneys.

7. On May 3, the same person posted a music video called "Dead Skunk" that was dedicated to Aaron Broussard and "the girls."

8. On April 28, 2011 Sop81_1 published a slabbed blog post comparing me and my business ventures to known criminal Bugsy Siegel and his enterprises. This post imputed that my partners and I had defrauded investors in our former Costa Rica hotel by overselling shares.

9. Sop81_1 published the following on slabbed.wordpress.com on April 26, 2011 in a post entitled "Slabbed takes a look at the Trout Point business venture: Let's start at the end and work back":

"In researching this story what I have found is a pattern of Leary, Abel and the girls being first class bitches and I think it is safe to assume based upon the retractions they made the Times Picayune and its corporate parent their bitch in this fiasco because Rainey was onto something big, albeit a bit dated in the fleecing of several local individuals that were marketed and sold ownership in the Trout Point by Aaron Broussard, who had close personal and business ties to Abel, Leary and the girls."

- 10. The April 28 post continued: "Leary, Perret and Abel were trying to use the Canadian Libel laws to strong-arm the Picayune and their parent Advance Publications;" and "Leary and the gang thought they buried the story."
- 11. In the same post, Sop81_1 continued to comment on a Supreme Court of Nova Scotia decision written by Justice A. LeBlanc. This dispute has now been settled. :"Like I said one of the sticking points was the disclosure of the owners of La Ferme D'Acadie, which Leary claims is the Dairy Farm portion of the Nova Scotia operations and despite the fact Abel's name evidently appeared on the paperwork to get the loan Leary was insistent Abel was not involved and the gyrations are simply stunning as we continue from the court opinion:

The applicant claims that broken pipes caused a flood in his home during the winter of 2002, resulting in the destruction of documents. In August 2005, Hurricane Katrina wiped

out the office of Daniel G. Abel, who was Mr. Leary's Louisiana attorney and business associate. The applicant maintains that he kept records of the partnership's dealings with the plaintiff, as well as other business records, at this location. In the spring of 2006 a break-in at Trout Point Lodge in East Kemptville, NS, resulted in the theft of a safe containing certain documents related to the transactions which are the subject of this proceeding.

Obviously there is a huge problem here – that of a liar or in this case a perjurer keeping his lies straight. Now maybe there was a bust pipe that took out vital records and maybe someone took time to drive to the middle of nowhere to steal the safe from a resort that was obviously not doing well financially. But Abel losing his records to Hurricane Katrina? Really Charles?

The judge did not appreciate Leary's arguments either and must have laughed him out of court."

12. In more than one place on the slabbed blog the following comment from someone with the pseudonym "unslabbed" was published in April, 2011:

Oh my, what a tangled web we weave when first we endeavor to deceive.

Welcome to Slabbed Danny and Carlie and Charlie and Vaughnie and any of you other Special Guys of Trout Point and Wild West.

Now I am VERY curious and inquisitive about you...and ALL your BUDS.

May I suggest BOYS that you all huddle quickly and decide if the Inquisition sure to follow continued attempts to GAG the Slabbed Nation is worth the information which will be elicted [sic] in protracted legal battles on all continents. Please remember that many of us enjoy Dual Nationalities, Counsulate [sic] Immunities, and have LONG REACHING tentacles ... perhaps longer than yours, although size is not really that important unless you are on the receiving end.

If I were you BOYS I would keep my head down, not bend over to pick up the soap and ride my horses into the sunset on Brokeback Mountain.

I, one Slabbed Nation member, vow to search you all out to the ends of the earth (Yes in Switzerland, Hawaii, France, Italy, Canada and Spain) anywhere any of you have any connections.

I have the time, temperament and now the impetus to set myself to this task. Hold on, it may be a bumpy ride for some of you.

See ya soon, Cowboys.

- 13. When I discussed this post with Vaughn Perret and Daniel Abel on the same day it was published we all agreed that this comment was threatening and that in the context of other postings referring to gay themed music and movies such as "Macho Man" and Brokeback Mountain, that the blog was publishing homophobic hate speech.
- 14. In association with blog posts related to Daniel Abel, Vaughn Perret, Trout Point Lodge, and myself, the "slabbed" blog published clips from music videos or movies with titles including "Killing me softly," "Pulp Fiction," and "Terminator II." I verily believe the theme running through these clips and numerous postings is violent revenge.
- 15. The publisher of the slabbed blog also posted material stating that there is a "mystery" and grandiose coverup underway involving me, my business associates, Aaron Broussard, and Louisiana news media. I read this material and verily believe it.

- 16. Louisiana Media Company/WVUE has to my knowledge and belief never published a retraction related to their January, 2010, broadcasts on television and the Internet that pictured and referred to Trout Point Lodge in the context of reporting on a Louisiana political scandal. Other news media, such as the Times-Picayune newspaper, have published more than one retraction related to identifying Trout Point Lodge in association with allegations about Aaron Broussard.
- 17. On April 7, 2010 the New Orleans Times-Picayune published the following on its web site. The newspaper is the major daily of the New Orleans metro area and I have read and verily believe it has won more than one Pulitzer Prize:
 - 18. Retraction Trout Point Lodge In January 2010, The Times-Picayune published several articles that mentioned Trout Point Lodge and its business dealings while discussing Jefferson Parish politics and the scandal in the administration of former Parish President Aaron Broussard. The newspaper retracts publication implying that Trout Point Lodge was involved in the scandal.

The newspaper believes there is no basis for making any implication that Trout Point Lodge, Limited or its owners, Daniel Abel, Vaughn Perret, or Charles Leary, were involved in any wrongdoing and, indeed, never intended to make any such implication. The Metropolitan Crime Commission complaint to the Louisiana Ethics Board about Broussard's vacation property in Nova Scotia in fact did not name or implicate any of them. The Times-Picayune apologizes for errors in its reporting regarding Trout Point Lodge and its owners.

19. On January 16, 2010, the Times-Picayune published the following in its print editions and online:

Trout Point Lodge assertions retracted by newspaper The Times-Picayune has referenced Trout Point Lodge in some of the stories published in print and online since Jan. 6 regarding an ethics complaint against former Jefferson Parish President Aaron Broussard claiming that he owns a Nova Scotia vacation lodge that he rented to parish contractors.

The newspaper retracts publication identifying Aaron Broussard as having an ownership interest in Trout Point Lodge; asserting Trout Point Lodge was rented to Jefferson Parish contractors; indicating that Roy D'Aquila has any part in Trout Point Lodge ownership or management; indicating that Kempt Wilderness Lodge Services has any ownership or management relationship with Trout Point Lodge; and identifying a photo of the lodge online as "Broussard-lodge.jpg." The Times-Picayune apologizes for publishing this material.

- 20. On April 27, 2011, the slabbed blog published: "And then one week and a day ago things changed with this Trout Point thing rearing its ugly head."
- 20. On April 20, 2011, the blog published: "It's never 'the crime' but the coverup that often lands people in hot water. The powers that be hung reporter Rich Rainey out to dry on his reports on Trout Point Lodge."
- 21. On April 18, the blog published that "the Times Picayune tried to shut us down." In another "comment" blog post SOP81_1 published: "Left with little choice I agreed to delete the content on Slabbed.org so I can get control of my blog back. I will not be deleting the content here and in fact we're going to examine not only the retracted story in detail but the players involved including Danny Abel, Charles Leary, Vaughn Peret and their Trout Point Lodge. . . . The Times

Picayune rolled over and played dead on this. We're not."

- 22. Sop81_1 continued: "if the T-P wants a war I gotta be able to fight it without worrying if my web host will pull the rug out from under me."
- 23. On April 28, 2011, the blog published: "Bit by bit and slice by slice I'm determined to reveal the truth behind Trout Point. Rich Rainey would have but his employer is a pussy."
- 24. I have monitored and investigated news media reports referring to Trout Point Lodge in the context of the Aaron Broussard political scandal. To my knowledge and belief, WVUE was the very first news media organization to publicly identify and refer to Trout Point Lodge in the context of reporting on Broussard, at approximately 9:28 pm on January 6, 2010. I have viewed this news broadcast, which shows video of Trout Point Lodge and its web site.

Sworn to before me

On May 12, 2011

at Yarmouth, Nova Scotia

Print name: COMMISSIONER OF THE SUPREME

COURT OF NOVA SCOTIA

Exhibit "A"

telemachus

Just a thought or recommendation: you might want to start tifing or pdfing these images and embedding them.

For instance I tracked back to the Billy Hills Trails links – is it still there?

Going back to that post raised a question for me: what is up with the TP and Broussard? Who gets a correction like that? Here's the original letter to the TP, from their site, which is still there:

http://media.nola.com/politics/other/Trout%20Point%20Lodge_TimesPic.pdf

The TP wrote a correcton that made it seem like everything reported about Nova Scotia was false. Well, it wasn't.

It's something else what other reporters miss, you really have to piece it all together: as a member of Chehardy Sherman, when Norma received the curatorship funds, wouldn't she have to share that money with her firm? She wasn't the only one profiting, it would have gone to the partners, right? So wouldn't guys like Lawrence Chehardy and Michael Ellis themselves get a cut of that at least if not more?

> This is Exhibit * A " referred to in the affidavit of Charles Learny

(sworn/affirmed) before me

on May id

Signature

ELAINE L. D'ENTREMONT COMMISSIONER OF THE SUPREME

COURT OF NOVA SCOTIA

unslabbed

Sop: Confirmed it was a new interview today by Bracy with Theriot. Gruntz refused to go on camera.

Also fyi reliable sources say Fox 8 was sued recently by Trout Pointe Lodge. Apparently they see having any connection to Aaron Broussard as a negative. Odd, that, since Danny Able et al (that would be the Spain connection across from the Alhambra and the Costa Rican location) seemed so keen on having the creme de la creme of the political elite as 'investors' in and around their prestigious property/properties. Odd also that a resort would object to any publicity for their business. Must be nice to be sooooo special and elite that only certain people are ok to be associated with their endeavors.

Kinda reminds me of the Villio fundraiser where Sheriff Normand told Fox 8 reporter Val Bracy she had 'no class' for showing up with a camera rolling. Again I ask: Wouldn't someone running for office welcome such TV coverage? Ok Ok I get it: only if they had nothing to hide. So when Villio snuck out a back door to avoid Ms. Bracy was that indicative of anything? I dunno. Duh. And when Mr. Normand who resides in prestigious OLD METAIRIE told Ms. Bracy she had 'no class' was that a classless statement or his class consciousness slipping out in a barely audible 'your kind don't belong here' comment? Either way not nice.

So we're back to why would Trout Point suddenly lash out at Val Bracy and Fox 8? After suing the Times Picurnose and effectively silencing them is this an attempt to do the same to Fox 8? Is Bracy hitting too many nerves? Seems strange to have waited so long to sue IN CANADA over a story that is old news. So maybe they want some more publicity for their joints? Hope they are ready for the depositions and Requests for Admissions coming their way. FYI Trout Point: if I were you I would review Aaron's interviews and the Fox 8 news accounts before I racked up much more in legal fees suing the wrong parties. Frivolous is frivolous and this is a silly lawsuit IMHO.

The American Zombie used to speak about the 4 walls that went around Nagin until he was finally boxed in.

I don't know who's in thw box here, but *somebody's getting enclosed, and I don't think Byron Lee is the end game here, do you?

Though I'm sure they'll be glad to bag him with the rest of the pigeons.

You have:

- The Lagniappe scandal
- Nova Scotia
- Post Katrina contracting
- Technology
- Non (Con) Profits
- River Birch
- Redflex
- Redman Gaming

They've got evidence from the days of the EWE investigation, from JP district court, from the Canal Street brothel, from Bill Jefferson.

Folks, if Nagin is caught in a box I think this is a purse sein net.

The USA has what, 30, maybe 40 attorneys? They have Orleans; the St.

Tammany bs; they have Danziger, they have the post-Katrina shootings (RIP). —

I think right now their priority is cleaning up the NOPD and there may be more to come out of that. But when they are done with that they will turn to other things, and you can be sure that call to prioritize that case came from DC.

The same of

Well this might be one thing the ethics board is looking at.

"""You can take a fishing pole and catch a trout in your front yard," Ed Muniz recalled Aaron Broussard telling him in 1998 about a real estate investment opportunity in Nova Scotia, Canada.

The subject, Muniz said, was Trout Point Lodge, a four-hour's drive from Halifax and deep in the pristine forest of a provincially protected wilderness area. Both men were serving on the Jefferson Parish Council at the time, and Muniz said Broussard asked him to buy into the development: \$25,000 for a 2 percent stake."

"The Metropolitan Crime Commission on Wednesday asked for a state ethics investigation into whether Broussard had been renting Nova Scotia vacation property to Jefferson Parish contractors. Two days later, Broussard resigned as parish president, citing the distractions of the widening federal criminal investigation into his administration.

The investigation began with subpoenas related to the private insurance business of Broussard's former chief administrator, Tim Whitmer, who resigned Monday. Federal authorities also have subpoenaed records regarding River Birch Inc., which owns a Waggaman landfill and signed a deal in June to be the sole garbage dump for Jefferson Parish for the next 25 years."

"Charles Leary, managing director of the lodge, e-mailed The Times-Picayune on Friday saying Broussard "does not and has never had any ownership or management involvement with Trout Point Lodge Limited." The message went on to say Broussard owns a "vacation home on the same road.""

"But the familiar names of some of the investors shed some light on the political lattice of Jefferson Parish.

They include Bennett Powell, who said last week he bought a small share in the lodge similar to the one described by Muniz, and Larry Stoulig, who is listed as a partner in Broussard's management company and who said other investors bought him out five years ago. The late Marie Krantz, former owner of the Fair Grounds and Jefferson Downs race tracks, and Nick Baroni, a Kenner City Council member while Broussard was mayor there, also invested in developing property near the lodge, Baroni said."

"Baroni and Stoulig have served time in federal prison on fraud charges in separate incidents unrelated to the Nova Scotia investments.

The link between Nova Scotia and southern Louisiana, outside of the historical link of Acadian culture, seems to have begun with Daniel Abel, a lawyer who made a name for himself in 1999 working with the late attorney Wendell ******Gauthier to sue gun manufacturers for violence in New Orleans. Muniz said ******Abel served as Broussard's legislative aide when he was on the Jefferson Parish Council."

"But Louisiana secretary of state records and documents provided by Muniz show that in 1997, Abel, Charles Leary and Vaughn Perret formed a Louisiana corporation called La Ferme Ltd. and its Canadian counterpart, La Ferme d'Acadie. The three soon opened the Trout Point Lodge, according to a 2001 travel story in The Times-Picayune.

After investing in the lodge, Muniz said he turned down a second offer from Broussard, in 1999, to buy nearby property. Having yet to see a financial report about the lodge, Muniz said he demurred on the new opportunity. ..."

- 1/10/10 TP.

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(All per the NS SOS):

LA FERME D'ACADIE, LIMITÉE shows up as being owned by Charles L. Leary, Vaughn J. Perret, and Daniel G. Abel. Now inactive. They also owned Trout Point Lodge. Now inactive. Perret & Leary own(ed) Trout Point Lodge Ltd. – Inactive as of a couple weeks ago, 2/5/11.

Perret also shows up on the net elsewhere as having a NOLA 70118 (Uptown) address.

Kempt Wilderness is still active and is still owned under the Broussard law firm address along with one other name (James E. Smith, Sr., who is/was partners with Warren Reuther in at least one version of New Orleans Paddlewheels, which of course was involved in the Flamingo Casino scandal (EWE/d'Hemecourt).

- This from the 7/22/01 TP (a wonderful long travelogie, by Millie Ball, the travel editor, why how *did* she ever find out about this charming out of the way place?):

Lafayette, who grew up working in restaurants, is a longtime family friend of Perret's. In the early 1990s, they united to start Chicory Farm in Louisiana's Washington Parish; they grew organic produce, but became better known for their goat cheese and blue cheese, which they sold to restaurants ranging from Commander's Palace to Gramercy Tavern and Picholine in New York. Abel took a two-year sabbatical from law to run Chicory Farm Cafe, a Creole vegetarian restaurant in New Orleans' University area."

"In 1998, they shut it all down. Perret's and Leary's reasons for leaving Louisiana for a while are personal and complicated, as those things tend to be. They already had bought a place in Nova Scotia... They opened the cheese dairy on Nova Scotia 's Chebogue Peninsula, and last summer, the lodge."

""Abel is the steadying glue — – and a good evangelist. The guys won't name names, but the 200 acres have become a haven for *****some prominent New Orleans and Jefferson residents. *****

And "Miss Marie's" house over there, that would be Miss Marie...? Listening carefully to his garbled pronunciation, I came up with **** "Marie Krantz?" "Yes, that's her," he said. As in the **** Fair Grounds' Marie Krantz.

******Wendell Gauthier is an investor, though he's never been here. New Orleans attorney ****Peter J. Butler Jr. said on the phone he ****invested as a 2 percent partner, and plans to visit for the first time next October. "We hope to make money, but if we don't, I hear it's a nice place to visit."

"He looked over at the river, and bent down to scratch Claudius. "Who loves you the most?" He petted him again, then headed to the kitchen to wash up. "I'm doing salads tonight.""

—— Prominent New Orleanians? Any Heebes per chance? Anyone else? Well, there's Peter Butler as an investor. Who knows who else.

What's French for "Woodpile"?

From TJR:

"On Jan. 7, 2010, the campaign of former Parish President Aaron Broussard paid the Bobby Cure Band \$1,800 to play at his next fundraiser. While that sounds like the makings for a great party, the following day actually saw Broussard abruptly resign from office in disgrace."

http://thejeffersonreport.com/?p=1764

That's pretty sudden isn't it?

"Aaron Broussard Interviewed by Val Bracy" (VIDEO) January 6, 2010; WVUE Fox 8" — Pretty sure it was the day before when the Rocky Marciano of New Orleans TV Real Journalism pounded, punched and ounished away at a bewildered and whimpering Aaron Broussard about his Nova Scotia property(ies).

As of and up to that day, and the day after, it appeared resignation was not something he had at least communicated in any way to anyone in his campaign.

\$

Really, what the hell...

government reaction to Hurricane Katrina, Jefferson Parish Councilman-at-large John Young and Parish President Aaron Broussard traded verbal blows Wednesday over the decision to evacuate local pump operators to Washington Parish and to return them only after thousands of homes had flooded.

Young, who said he bore no responsibility for evacuating pump personnel Aug. 28, called for a policy change that would keep those workers inside Jefferson Parish during powerful hurricanes rather than shipping them 110 miles north to Mount Hermon, where some 200 operators rode out Katrina. They returned Aug. 29 about 7 p.m. — about nine hours after the storm made landfall — to find many neighborhoods inundated.

"Whatever we do in the future, I think it is imperative that we have the pump operators remain in Jefferson Parish," Young said, suggesting the workers be assigned to West Jefferson Medical Center and East Jefferson General Hospital, where thousands of patients and medical staff — along with Broussard, Young and Councilman Byron Lee — weathered Katrina.

Four separate occasions:

- 1. Young confronts him on the Doomsday plan: Broussard blows up, calls Young a liar.
- 2. Russerts confronts him on tv re: who is responsible for evacuating or not evacuating: Broussard disintegrates.
- 3. Russerts confronts Broussard again about whether the local governments had any responsibility: Broussard responds by describing such people who questions his own personal evacuation story about Thomas Rodrigue's mother dying as "black-hearted people" and then proceeds to again fly off at the very pursuit of questioning about local governments' management or lack thereof.

http://www.msnbc.msn.com/id/9438988/ns/mcet_the_press/

4. Val Bracy confronts Broussard on his Nova Scotia holdings and the machinations and self-dealings of those in his administration: Broussard simpers on air, says he has no idea what she's talking about and then quits the next day.

9

Karen, Aaron, Peter Butler (when he's asked to appear, and he will be one day), Lagasse, Capella, Roberts, Lee, etc., etc., etc.;

According to the 7/22/01 TP, Peter Butler was an investor in at least one of the (unidentified) properties at Trout Point Lodge, Nova Scotia, as were Wendell Gauthier and Aaron Broussard.

Were you, and/or was anyone named Heebe, Sneed, Ward, Butler, and/or any JP public official, aide or employee or their relatives, invested or themselves in any way investors in any of the below entities, and if so in what amounts, which percentages and which entities and for what periods?

PRAKA-NOVA SCOTIA

PUBLIC WORKS INVESTMENTS

PUBLIC WORKS, INC.

LA FERME D'ACADIE, LIMITÉE

KEMPT WILDERNESS

TROUT POINT LODGE LIMITED

TROUT POINT LODGE

telemachus

You can add the name Connick and/or the names of any person holding any interest in any JP contract as to the above named entities.

Unslabbed

I would hazard a guess that the 'unspecific' subpoenas issued this past week to the Jefferson Parish Councilmembers will result in Grand Jury testimony and a clearer picture of where the federal investigation in headed.

Possible Topics:

Post-Katrina Debris Clean-up payments made to Hubbard by Jefferson Parish (mis-use of federal funds)

Nova Scotia properties owned and operated by Broussard (wire fraud)
Payroll fraud and the two aforementioned items (conspiracy)

NOTE: This is a very partial list of possible topics.

S15 Million my arse...that was just by Oct 2005. By February 2006 had climbed to S32 Million.

And both Aaron Broussard and then Finance Director Nancy Casseign signed off on the checks.

Now I ask you: what could Hubbard possibly have done in October 2005 to warrant \$15 million dollars...no one was here...there were no workers and the people still were not back.

And another cool \$17 M by February 2006? Help me out here.

BTW: another famous Billy Tauzin quote when talking about the DC media giving him a hard time for being from Corruption-riddled Louisiana where all politicians are bought and paid for: "I resent that comment. I cannot be bought. I can be rented."

nowdoucit

*

"what could Hubbard possibly have done in October 2005 to warrant \$15 million dollars..."

Don't know, Unslabbed, but whatever it was, it wasn't a "minimum wage job"

Unslabbed

Hey Whitmergate: Is that a Camry as your avatar?

Nowdy:S15 million buys a lot of Carmy cars for special friends too.

Or just maybe that money ended up in NOVA SCOTIA????